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11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA
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14 (HONORABLE JANIS L. SAMMARTINO)

15 UNITED STATES OF AMERICA,) CASE NO.: 08CR1007-JLS
16 Plaintiff,)
17 v.) Date: May 16, 2008
18) Time: 1:30 p.m.
19)
20) NOTICE OF MOTIONS AND MOTIONS TO:
21 **MIGUEL ANGEL NEGRON,**)
22 Defendant.) (1) COMPEL DISCOVERY;
23) (2) PRESERVE EVIDENCE; AND
24) (3) GRANT LEAVE TO FILE FURTHER
25) MOTIONS

26 **TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND**
27 **DAVID LESHNER, ASSISTANT UNITED STATES ATTORNEY:**

28 PLEASE TAKE NOTICE that on May 16, 2008, at 1:30 p.m., or as soon thereafter as counsel may
1 be heard, defendant, MIGUEL ANGEL NEGRON, by and through his attorneys, Hanni M. Fakhoury and
2 Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Defendant, MIGUEL ANGEL NEGRON, by and through his attorneys, Hanni M. Fakhoury and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Compel Discovery;
- (2) Preserve Evidence; and
- (3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: May 1, 2008

s/ Hanni M. Fakhoury
HANNI M. FAKHOURY
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Negron

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

U S Attorneys Office Southern District of California
880 Front Street
Room 6293
San Diego, CA 92101
(619)557-5610
Fax: (619)235-2757
Email: Efile.dkt.gc2@usdoj.gov

A copy was sent via electronic mail to:

David Leshner
Assistant United States Attorney
David.Leshner@usdoj.gov

Respectfully submitted,

Dated: May 1, 2008

/s/ *Hanni M. Fakhoury*
HANNI M. FAKHOURY
Federal Defenders of San Diego, Inc.
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Hanni_Fakhoury@fd.org